

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

POOL SPECIALISTS, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. No. 5:24-cv-244-FL
)	
)	
RYOBI, LTD.; RYOBI)	
TECHNOLOGIES, INC.;)	
RYOBI HOLDINGS (USA), INC.;)	
ONE WORLD TECHNOLOGIES, INC.;)	
TECHTRONIC INDUSTRIES)	
COMPANY LIMITED;)	
TECHTRONIC INDUSTRIES)	
NORTH AMERICA, INC.;)	
TTI CONSUMER POWER TOOLS,)	
INC.; HOME DEPOT U.S.A., INC.;)	
THE HOME DEPOT, INC.; and)	
HOME DEPOT MANAGEMENT)	
COMPANY, LLC)	
)	
Defendants.)	

DECLARATION OF JOHN PAUL DEMONICO JR.

I, John Paul DeMonico Jr., under penalty of perjury, declare pursuant to 28 U.S.C. § 1746, as follows:

1. My name is John Paul DeMonico Jr.. I am over twenty-one years of age and am competent to make this affidavit. I am currently the Treasurer for TTI Consumer Power Tools, Inc., ("TTI-CPT") (f/k/a One World Technologies, Inc.). The facts stated in this declaration are based on my personal knowledge and are true and correct.

2. Techtronic Industries Co. Ltd. ("TTI-HK") controls 100% of the shares of Techtronic Industries North America, Inc. ("TTI-NA").

3. TTI-CPT is a wholly-owned subsidiary of TTI-NA. TTI-HK does not manage or direct TTI-NA's or TTI-CPT's daily operations. Each is an adequately capitalized independent corporate entity.

4. TTI-CPT is responsible for the design, manufacture, and distribution of all Ryobi-brand lithium-ion leaf blowers, battery packs, and battery chargers distributed in the United States.

5. TTI-CPT was responsible for the design, manufacture, and distribution of the Ryobi-brand lithium-ion leaf blower, battery pack, and battery charger at issue in this case ("Subject Products"). TTI-HK had no direct involvement or control in the design, manufacture, or distribution of the Subject Products.

6. TTI Consumer Power Tools, Inc., is formerly known as One World Technologies, Inc. ("One World"). One World is not a separate or distinct corporate entity. In 2004, Ryobi Technologies, Inc., merged into One World. In connection with that merger, One World (n/k/a/ TTI-CPT) assumed all of the assets and liabilities of Ryobi Technologies, Inc. Ryobi Technologies, Inc., is not a separate or distinct corporate entity. Ryobi Technologies, Inc., was not responsible for the design, manufacture, distribution, or sale of the Subject Products.

7. Ryobi, Ltd., has never been affiliated with or owned, operated, managed, controlled, or employed by TTI-HK, TTI-NA, TTI-CPT or any of its affiliates. In or around 2000, TTI-CPT acquired the rights to use the "Ryobi" brand pursuant to a license granted by Ryobi, Ltd. Ryobi, Ltd., was not responsible for the design, manufacture, distribution, or sale of the Subject Products.

8. Ryobi Holdings (USA), Inc., has never been affiliated with or owned, operated, managed, controlled, or employed by TTI-HK, TTI-NA, TTI-CPT or any of its affiliates. Ryobi Holdings (USA), Inc., was not responsible for the design, manufacture, distribution, or sale of the Subject Products.

9. TTI-NA and TTI-CPT are sufficiently insured against any potential liability that may arise out of or in connection with Plaintiff Pool Specialists Inc.'s claims in this action.

10. TTI-NA and TTI-CPT have sufficient assets to satisfy any applicable self-insured retention associated with the aforementioned insurance policies, including but not limited to cash, bank accounts, accounts receivable, real and personal property, buildings, machinery, equipment, tooling, product inventory, raw materials, work-in-progress, finished goods, supplies, and automobiles.

11. TTI-CPT originates the orders for the manufacture and shipment of products sold in the United States. Through those orders, TTT-CPT determines the quantity and type of products to be produced as well as the ultimate shipping destination for the finished products.

12. TTI-HK neither originates orders for products nor determines the types of products ordered, the quantity of products ordered, or the ultimate shipping destination for products.

13. TTI-HK does not approve, reject, enlarge, or otherwise modify orders of products set by TTI-CPT.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 2nd day of August 2024.

A handwritten signature in blue ink, reading "John Paul DeMonico Jr.", written over a horizontal line.

John Paul DeMonico Jr.